REMARKS

The above amendment and these remarks are responsive to the Office Action of Examiner Baoquoc N. To, mailed 19 Apr 2004.

Claims 1-37 are in the case, none as yet allowed.

Response to Arguments

Applicants have been instructed to submit an argument under the heading "Remarks", pointing out disagreements with the Examiner's contentions, and discuss the references applied against the claims, explaining how the claims avoid the references or distinguish from them.

Applicants call to the attention of the Examiner the material in the previous Response at pages 20 to 23 for just such an argument and explanation with respect to Rail et al. (U.S. Patent 5,680,611, hereinafter, Rail) For the convenience of the Examiner, this material will be restated below in connection with the current Office Action, and

expanded upon in view of the new art reference, Schweitzer et al. (U.S. Patent 5,680,611, hereinafter Schweitzer).

Claim Objections

Claims 7 and 29 have been objected to for the use of duplicate words "on flagged".

The Examiner is correct, and applicants have amended the claims as suggested.

35 U.S.C. 103

Claim 1-37 have been rejected under 35 U.S.C. 103(a) over Rail, et al., U.S. Patent 5,680,611.

In this rejection (based only on Rail), the Examiner applies the art to claims 1-6, 26-27 and 36. Applicants will discuss these claims with respect to Rail. The other claims are discussed with respect to Rail in view of Schweitzer.

Applicants traverse and argue that the Examiner has not established a prima facie case of obviousness. The legal basis for this traversal is set forth in greater detail in the prior Response, dated on or about 8 Oct 2003.

With respect to claims 1-37, Rail describes a duplicate record detection system and method where a checksum is derived for selected fields of records, and the checksums of a selected record compared with checksums of a selected file. (Col. 4, lines 46-55). Rail relates to call detail records (CDRs), records which are created when a telephone customer places a telephone call. These are not invoices, are not like invoices, and are not processed like applicants' invoices.

With reference to claims 1, 26, and 36, Applicants traverse and argue that the Examiner has not established a prima facie case of obviousness. The legal basis for this traversal is set forth in greater detail in the prior Response, dated on or about 8 Oct 2003.

The Examiner characterizes the follow teaching of Rail as "replacing said another record, if found with said first record" (Office Action, page 3):

"The method compares the generated checksum for the currently processed record with stored checksums in the selected check file at step 108. The small and fixed size of the generated and stored checksums allow the comparison step to utilize an efficient binary search technique. If no match is found, then the generated checksum is stored in the check file at step 110. In addition, a unique transaction identifier may be stored with the generated checksum." (Rail, Col. 4, lines 34-41.)

There is no teaching here of replacing records in a database having the same index number, as applicants claim:

"...for each record having said index number, searching said database for another record, loaded during a second earlier time period, having the same index number and replacing said another record, if found, with said first record;..." (Claim 1, lines 5-9. See also claims 26 and 36).

There being no teaching of replacing records, Rail (at Col. 4, lines 40-52) cannot teach the concept of comparing each of the records loaded into the database "for which no

matching index number record was found with all the other records including the replaced records..." (Claim 1, lines 14-16). For this teaching, the Examiner (Office Action, page 3) cites Rail at Col. 4, lines 46-52. Here Rail teaches:

> "If the generated checksum matches a stored checksum in the selected check file at step 108, then the transaction identifier of the current record and the transaction identifier associated with the matching stored checksum are compared at step 114. If the transaction identifiers do not match, then a duplicate has been identified and the record is stored in a duplicate file at step 116."

With respect to claim 2, the Examiner refers to Rail at Col. 3, lines 5-10. Here Rail is describing billing records based on CDRs to be sent out as invoices to customers, not the processing of invoices received for payment. Further, claim 2 depends from claim 1, and is distinguished from Rail as previously described.

With reference to claims 3 and 27, the Examiner asserts that Rail teaches applicants' "compact database", which is

maintained "by removing canceled invoice documents and invoice documents older than a predetermined period". (Claim 3, lines 5-7). For this teaching the Examiner refers to Rail at Col. 3, lines 41-46, which states:

> "After a record is received for processing at step 100, key fields of the record are then selected for checksum processing at step 102, if appropriate or desired. Selecting a few key fields from an entire record reduces the amount of data processed and stored during checksum processing."

The "compact database" is maintained in Rail by "selecting a few key fields", not by "removing canceled invoice documents and invoice documents older than a predetermined period", as in applicants' claims 6 and 27.

Applicants have canceled claims 3-5 and rewritten claim 6 to include their limitations.

With respect to claim 4, which by this amendment has been incorporated in claim 6, the Examiner asserts that Rail teaches entry of invoice data from a plurality of accounts payable systems at Col. 3, lines 1-2. (Office Action, page

5.) This is what Rail teaches:

> "Check files 30 may store checksums of CDRs for the past three months or more, depending on storage capabilities, the likelihood of receiving latent duplicant records, and other factors." (Rail, Col. 2, line 66 to col. 3, line 2.)

There is no teaching here of entering invoice data from a plurality of accounts payable systems. CDRs are call detail records (Rail, Col. 2, lines 6-7), and while these may be entered from various sources, they are not accounts payable systems.

With respect to claim 5, which by this amendment has been incorporated in claim 6, the Examiner asserts that Rail teaches entering invoices into a compact database for payment at a later data (sic, date), and references Col 3, lines 45-50. This is what Rail teaches:

> "Using the example of CDR processing in FIG. 1, a complete CDR may occupy four thousand bytes or more of storage space, whereas selected key fields may occupy one hundred bytes or less." (Rail, Col. 3, lines 45-

50.)

There is no teaching here of entering invoices for payment later. Rail is discussing the generation of invoices to be sent out, not the processing of invoices to be paid.

With respect to claim 6, the Examiner asserts "Rail teaches the step responsive to submission of an invoice with a null invoice indicia field of entering data indicia in said null invoice indicia field." (Rail, col. 3, lines 53-55).

This is what Rail teaches:

"Using the selected key fields of the record, the method generates a checksum at step 104." (Rail, Col. 3, lines 54-55).

This is what applicants claim:

"...responsive to submission of an invoice with a null invoice indicia field entering date indicia in said null invoice indicia field..." (Applicants' claim 6).

The Examiner refers to "data" indicia (presumably the check sum), and applicants claim "date" indicia, which is not a check sum. In either event, Rail doesn't teach what applicants claim.

Claims 7-25, 27-35 and 37 have been rejected under 35 U.S.C. 103(a) over Rail in view of Schweitzer.

With reference to claims 7, 28-29 and 37, applicants have amended claims 7, 28, 29 and 37 to further describe the process of applicants' invention, as that is taught in their specification with respect to Figure 2 at Page 10 line 11 to Page 15 line 15.

With reference to base claims 7, 28-29 and 37, and their respective dependent claims 8-25 and 30-35, applicants previously amended the claims to specify the specific reports generated from the packets. These are the reports set forth in Figure 3 and summarized in the specification at page 24, lines 5-11, which are fed to analysts for further processing. Rail does not teach the generation of such reports. The Examiner states:

"Rail does not explicitly teach generating from said

current invoices and said history invoices a packet of invoices... and generating from a plurality of said packets [several reports recited in claims 7 and 29]. (See Office Action, page 6).

And then asserts:

"However, Rail ... teaches the comparison of current record (invoice not yet been paid) and stored checksum (history invoices) to identify the duplicate, and if it si not duplicate then the currently (sic) invoice is stored in the master file (packet). (Office Action, page 6).

And continues, referring to Schweitzer:

"...Schweitzer teaches 'removing the duplicate records from the central database 175' (fig. 5) and 'customized reporting with built-in-report generation or an NSPs choice of off-the-shelf graphical reporting packages' (col. 4, lines 17-18)."

Applicants traverse. This characterization of the teachings of Rail and Schweitzer relies on applicants' own

claims. The specific reports the claims recite are not taught by either Schweitzer or Rail. Nor is the claimed generation of packets from which those reports are derived taught or suggested by either reference.

Claims 8-25 depend from claim 7, and claims 30-35 depend from claim 29, the base claims having been amended to recite further details of the generation of packets not taught by either Rail or Schweitzer.

Applicants urge that claims 1-37 be allowed.

SUMMARY AND CONCLUSION

Applicants urge that the above amendments be entered and the case passed to issue with claims 1-37.

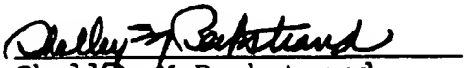
The Application is believed to be in condition for allowance and such action by the Examiner is urged. Should differences remain, however, which do not place one/more of the remaining claims in condition for allowance, the Examiner is requested to phone the undersigned at the number provided below for the purpose of providing constructive assistance and suggestions in accordance with M.P.E.P.

Sections 707.02(j) and 707.03 in order that allowable claims can be presented, thereby placing the Application in condition for allowance without further proceedings being necessary.

Sincerely,

W. D. Calkins, et al.

By



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